

Intercollegiate Broadcasting System
Washington, DC

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Gentlemen:

The FM Study Group of the Intercollegiate Broadcasting System is attempting to determine the extent of interest in a new form of FM broadcasting by college radio groups.

The FM Study Group of IBS has been organized to examine the relative benefits to college radio of FM operation of various forms. Modes of operation presently in use by colleges and universities include:

1. Non-commercial Educational FM
 - a. Low Power (10 watts or less operating power)
 - b. Regular Power (250 watts or more rated power)
2. Commercial FM with suitable time waivers
(250 watts or more rated power)

In addition, the FM Study Group is preparing a proposal for rule-making by the FCC to establish a new low power Commercial FM mode. This is described on the following page.

Low Power Commercial FM as described has been considered by IBS in answer to a need expressed in the past by several college groups. It is designed to provide limited radiation commercial broadcasting for increased coverage to college audiences, without incurring the additional programming responsibilities of regular Commercial FM with its somewhat greater audience. In order to provide commercial advertising benefits beyond the scope of low power Non-commercial Educational FM, suitable technical and programming requirements have been included in addition to those now applying to Educational FM, to insure that the resulting broadcasting quality is on a par with existing Commercial FM service. However, these requirements are reduced from those presently applying to Commercial FM in order that restrictions to college radio operation shall not be prohibitive.

We are inviting you as a representative college group to indicate the extent of interest in this field. The nature of the information that we seek at this time is an indication of relative benefit as it would appear to a college radio group in general with practical operating experience. We do not presently require an indication of whether your group in particular expects to be able to use such a mode of operation when it becomes available. However, we would appreciate receiving such information if it were supplied (question 2 below).

It may be recognized that this work is an attempt to plan for the future, possibly the very near future. It goes without saying that

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the extent of benefit from such a mode of operation, whatever detailed form it may take, will be proportional to the extent of present planning. That planning can only be as good as the information supplied from groups with practical operating experience

We therefore ask you to invest 1 minute 30 seconds of your time in the future of college radio by reading the next page and completing and mailing the enclosed question sheet.

Respectfully yours,

Charles E. Pengilly

Director, FM Study Group, IBS

LOW POWER COMMERCIAL FM
(As described in a Proposal for Rule-making to be
presented shortly by IBS before the FCC)

The service to be offered would consist of Commercial FM broadcasting at low power levels by non-profit educational groups. Some more important features of this service are described as follows.

Such a form of license would specifically be granted only to a group directly associated with a duly accredited educational institution, which group would operate financially on a non-profit basis. Program service would be primarily directed toward the college community, including the student body, staff, and nearby alumni of the institution.

The transmitter power output would be ten watts or less. Carrier frequencies available for assignment would include all Class A channels in the commercial FM band (from 92.1 to 107.1 mc.)

The FCC's Standards of Good Engineering Practice covering this form of transmission would be those presently applying to all classes of Commercial FM broadcast stations, except to the extent specified below. Periodic monitor of the transmitter frequency would be required, but such equipment need not be part of the installation. Also, some suitable modulation indicator would be required. The audio frequency range, distortion, carrier hum, and noise level would be specified only to the same extent as present low power Non-commercial Educational FM requirements. Carrier frequency tolerance would also be the same as for present low power Educational FM.

Operating time would be specified as 25 hours per week minimum, with exceptions of the summer vacation and other major vacation periods, to be specified on the station license.

Operator requirements would specify that at least one first or second class commercial radiotelephone license holder must be in actual charge of the transmitter, to turn it on or off and to make adjustments or repairs. In all other respects, the station could be operated by persons holding almost any commercial radiotelephone license.

